



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 24 1998

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for the Ottawa Radiation Superfund Site

FROM: Bruce K. Means, Chair
National Remedy Review Board

A handwritten signature in black ink, appearing to read "BK Means".

TO: William E. Muno, Director
Waste Management Division
EPA Region 5

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the Ottawa Radiation Areas Superfund site. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative.

The NRRB review evaluates the proposed actions for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; Regional, State/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. The Region will then include these recommendations in the Administrative Record for the site. While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options may influence the final Regional decision. It is

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important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

NRRB Advisory Recommendations

The NRRB reviewed the informational package for the site and discussed related issues with EPA site manager Matt Mankowski on June 8, 1998. Based on this review and discussion, the Board offers the following comments.

- EPA Directive 9355.7-04, Land Use In the CERCLA Remedy Selection Process (May 25, 1995), emphasizes the importance of stakeholder participation in determining reasonably expected future land use. State input is particularly important at this site given that the State has several roles (i.e., property owner, Natural Resource Trustee, regulator). However, the Region has been able to elicit only limited information from the State on this issue. The Board encourages the Region to continue working closely with the State to determine its position, as future land use is critical to this cleanup decision.
- Based on available State and other stakeholder input, the Board does not believe a recreational use scenario at this site is unreasonable. In addition, the Board acknowledges that there is a broad range of restoration and habitat management options available given such recreational use. With this in mind, the Board believes that the proposed "high-end" recreational use scenario (e.g., a park manager living on the site or prairie habitat) may not be appropriate given the site's past use. Further, given past site use and the need for institutional controls, under any clean-up scenario that leaves some waste in place, the proposed ten foot excavation depth across the entire site appears excessive. The Region should better justify in its decision documents whatever excavation depth(s) it selects.
- The site package and Regional presentation did not provide information sufficient to determine whether soil contaminants may in the future leach into potable ground water. The Board recommends that the Region more fully explain in its decision documents the relationship of contaminated soil to potable ground water, including the relationship of the perched aquifer to the deeper aquifer. It should also consider using dilution and attenuation factors or other modeling to evaluate whether the remedy will be protective for ground water over time. The Region should consult Section 2.5 of EPA's Soil Screening Guidance: Technical Background Document (EPA/540/R-95/128) for further guidance.
- The Region's information package indicates that the Region expects significant contaminated soil volume reduction through the use of a segmented gate system (SGS). Based on experience at other sites, the Board believes these estimates may be optimistic. The Board recommends that the Region explain in its decision documents that the field documented volume reduction associated with SGS ranges from approximately twenty to sixty-five percent.
- The Region should clarify in its decision documents whether the sheet piles identified in alternatives 2 and 3 are intended to provide structural stability for the cap, or whether the Region intends them to act as a barrier to prevent the migration of perched ground water to the Fox River. Should their purpose be the latter, the Board questions why the Region did not include them in other alternatives.

The NRRB appreciates the Region's efforts to work closely with the State and community to identify the current proposed remedy. The Board members also express their appreciation to the Region for its participation in the review process. We encourage Region 5 management and staff to work with their Regional NRRB representative and the Region 5/7 Accelerated Response Center at Headquarters to discuss any appropriate follow-up actions.

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Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: S. Luftig
T. Fields
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OERR Center Directors

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